

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE  
WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION

UNITED STATES OF AMERICA :  
:  
v. : Case No. 7:16CR0004  
:  
RAHMYENE SHREEF JONES :

**STATEMENT OF FACTS**

This Statement of Facts briefly summarizes the facts and circumstances surrounding the criminal conduct of the defendant, Rahmyene Jones, which is at issue in this case. It does not contain all of the information obtained during the investigation and applicable to an accurate Presentence Investigation Report and Sentencing Guidelines calculation. The conduct described below occurred within the Western District of Virginia, and elsewhere.

This Statement of Facts is not protected by proffer agreement or any other agreement, and shall be wholly admissible at trial notwithstanding any Rules or statutes to the contrary, including, but not limited to, Federal Rules of Evidence 408 and 410 and Federal Rule of Criminal Procedure 11.

On July 15, 2014, ATF utilized a confidential informant to make a controlled purchase of cocaine base from Rahmyene Jones in the Western District of Virginia. The confidential informant turned over the cocaine base to law enforcement and law enforcement submitted the cocaine base to the lab. The lab determined the substance purchased from Jones to be 9.6 grams of substance containing cocaine base.

On May 27, 2015, Roanoke City police officers received information from an individual regarding Rahmyene Jones. The individual advised law enforcement that he was purchasing heroin from an African American male with long dreads at a specific location in Roanoke. The officers then conducted surveillance at the specific location, and while conducting surveillance, officers observed an African American male with long dreads get out of the passenger side of a vehicle, go inside of the residence, and in less than 5 minutes, the same individual walked back out of the residence and left. A traffic stop was conducted on the vehicle, and during the stop, the male passenger was identified as Rahmyene Jones. Jones would not exit the car when asked. Jones then balled up his fist. Officers then forced Jones to exit the car, and once he had exited the car, bundles of heroin were observed in the seat where Jones was sitting. These bundles of heroin were taken into custody at the time.

Then, on September 2, 2015, law enforcement conducted a traffic stop of a vehicle being operated by Rahmyene Jones, as Jones was known to have a restricted license. Roanoke City Police Officer Crotts approached the vehicle, and smelled the odor of marijuana. Jones was removed from the car, and he was searched. Nothing was found on his person. There was a passenger in the vehicle, and the passenger was observed reaching behind his back by another officer. The passenger was asked to step out of the vehicle, and once he was out of the vehicle, a large bulge was observed in the buttocks area of his shorts. Law enforcement Officer Flippen shook the shorts of the individuals and a large quantity of glassine packets fell from his shorts. The packets were stamped "Batman." The heroin was counted and it was four bricks of heroin. Law enforcement seized this heroin as part of evidence.

Rahmyene Jones was arrested by ATF on a criminal complaint on January 6, 2016. Jones waived his Miranda Rights, and agreed to speak with ATF SA Billy Cunningham and ATF SA Brock Newton. Jones admitted that he had sold crack cocaine previously. Jones also admitted that he was a heroin dealer. Jones stated that he was involved in two traffic stops in Roanoke City and that he had possessed heroin on those days, and he was intending to distribute the heroin. Jones admitted that he was selling heroin and he had multiple sources of supply.

I have reviewed the above Statement of Facts with my attorney and I agree that it is true and accurate. I agree that had this matter proceeded to trial, the United States would have proven the facts outlined above beyond a reasonable doubt.

3-22-16

Date

Rahmyene Jones  
RAHMYENE JONES  
Defendant

3/22/16

Date

Randy Cargill  
Randy Cargill  
Attorney for Defendant